

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jhael J. Garcia Cruz, a Special Agent with the United States Drug Enforcement Administration (hereinafter referred to as DEA), U.S. Department of Justice, being duly sworn, depose and state as follows:

INTRODUCTION

1. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510 (7). I am, therefore, an officer who is empowered to conduct criminal investigations, and to make arrests for, offenses enumerated in Title 18, United States Code, Section, 2516. I am a Special Agent with the DEA and have been employed since 2024. As a Special Agent, I have been sworn to enforce the laws of Title 21, United States Code, and related offenses under Title 18, United States Code. I have received 17 weeks of training at the DEA Training Academy in Quantico, VA. I am currently assigned to the DEA Caribbean Division Airport Investigations and Tactical Team (AirTAT). During my law enforcement training and career, I have received detailed instruction in and conducted various investigations concerning the unlawful importation and distribution of controlled substances; the laundering and concealment of drug proceeds; and the illegal use of communication facilities by drug traffickers in furtherance of their criminal activities.
2. Based on my training and conversations with other law enforcement officers, I have become familiar with the trafficking of illegal drugs and it's proceeds, and with the drug trafficking organizations operating in Puerto Rico. As part of my official duties, I am required to participate in seizures of property and currency, which are obtained from proceeds of illegal drug trafficking activity. Moreover, I have been trained how to interview persons involved in the drug trafficking and money laundering business. Through my training and experience, I have become familiar with the modus operandi of drug traffickers and their methods of communication, which includes the use of cellular telephones.
3. The information in this affidavit is based upon my personal knowledge, as well as information that I have received from other law enforcement sources. Because this

affidavit is made for the limited purpose of establishing probable cause for the issuance of an arrest warrant, I have not recited each and every fact known to me as a result of this investigation. As a result of my personal participation in this investigation, conversations with other law enforcement officers, reports and other sources, I am familiar with the circumstances described in this affidavit.

4. I make this affidavit in support of a criminal complaint concerning the following federal offense: Possession with Intent to Distribute Five Kilograms or More of Cocaine in violation of 21 U.S.C. § 841(a)(1).

PROBABLE CAUSE

5. The Drug Enforcement Administration (DEA) Caribbean Division (CD) Airport investigations and Tactical Team (AirTAT) members in Puerto Rico are working in conjunction with the Department of Homeland Security's (DHS) Homeland Security Investigations (HSI), Transportation Security Administration (TSA), and Puerto Rico Police Bureau (PRPB) at the Luis Munoz-Marin International Airport (LMMIA).
6. On March 6, 2025, at approximately 3:30 p.m., PRPB along with HSI personnel were conducting luggage inspections with a drug-detection canine (K-9). During the inspection the K-9 alerted positive to the presence of the odor of narcotics on two light colored, hard shelled, suitcases registered through JetBlue Airlines. The suitcase was tagged to Tosada-Sanchez and destined for Hartford Connecticut, via a flight from San Juan, Puerto Rico, on JetBlue Airlines. HSI AirTAT personnel working at LMMIA made contact with a female subject who was later identified as Dannyshka Tosada-Sanchez (identified through her Passport along with Boarding Pass). Her boarding pass revealed her travel destination was Hartford, Connecticut. Tosada-Sanchez informed HSI AirTAT agents she was traveling to Connecticut to visit family members.
7. At this point, HSI AirTAT agents asked Tosada-Sanchez if they could talk to her in private due to a PRPB K-9 alerting to the odor of narcotics on the two-light grey, hard shelled, suitcase registered to her name. After moving to a less crowded area in the airport by the JetBlue Gate A-6, HSI AirTAT advised Tosada-Sanchez she was not under arrest and HSI AirTAT agents asked her if the two-light grey, hard shelled,

suitcase registered under her name (Dannyshka Tosada-Sanchez) were her property, Tosada-Sanchez admitted that the two-light grey, hard shelled, suitcases registered to her name was her property.

8. HSI AirTAT agents asked Tosada-Sanchez if she could open the two-light grey, hard shelled, suitcases, in where Tosada-Sanchez asked HSI AirTAT agents if they could hold her food, she currently had in her hands so that she could open her suitcases. HSI AirTAT agents asked Tosada-Sanchez if she prepared the two-light grey, hard shelled, suitcases registered under her name, Tosada-Sanchez stated her cousin prepared the two suitcases under her name.
9. Members of HSI AirTAT gained consent to open the suitcase from Tosada-Sanchez to look within the two suitcases registered to her name. With the consent of Tosada-Sanchez, HSI AirTAT agents looked inside the suitcases, to which they discovered 12 brick-shaped objects wrapped in clear plastic, surrounded by clothing inside the suitcase. At this point, HSI AirTAT personnel escorted Tosada-Sanchez to the AirTAT office at the LMMIA, where she was arrested by DEA AirTAT members and advised of her Miranda Rights. Based on experience and training of the agents, the brick-shaped objects were consistent with the shape and size of kilogram bricks of cocaine.
10. On the same date, HSI AirTAT personnel called DEA AirTAT personnel for assistance and DEA AirTAT personnel took custody of the case.
11. The brick-shaped objects were field tested by DEA AirTAT members with positive results for cocaine and weighed approximately 13.0 kilograms.

CONCLUSION

12. Based on the foregoing, I believe there is probable cause that Dannyshka Tosada-Sanchez committed the following Federal offense: Possession with Intent to Distribute Five Kilograms or More of Cocaine, in violation of 21 U.S.C. § 841(a)(1).

Jhael Garcia Cruz

Jhael Garcia Cruz
Special Agent, DEA

Sworn in accordance with the requirements of FRCP 4.1 at 8:42 AM by telephone, this 7th day of March 2025.

Hector L. Vega



Hon. Hector Ramos-Vega
United States Magistrate Judge
District Of Puerto Rico